

JUN 05 2001

IRENE NAVIS: For the record my name is Irene Navis. I'm with Clark County Department of Comprehensive Planning. I'd like to thank the DOE for this opportunity for all of us to speak this evening.

1 Clark County is an affected unit of local government under the Nuclear Waste Policy Act of 1987. We'd like to concur with the comments of the State of Nevada and other affected units of government stated so far this evening, especially the comment about the comment period of 45 days not being sufficient for the effective units of government to prepare comments. And we have also formally requested an extension of 45 days.

2 Clark County's comments to the Draft Environmental Impact Statement from February of the year 2000 have yet not been addressed. We believe that merely attaching them to the Final Environmental Impact Statement is not sufficient or acceptable.

The SDEIS failed to address a multitude of public concerns. Because of those gaps and omissions, the County is currently preparing an impact assessment report, and we would request that the Department of Energy release the public response document before the Final Environmental Impact Statement in order for us to adequately prepare those reports.

3 The DOE has not yet addressed the full scope of impacts on a national level, for example transportation.  
4 Absent a specific repository design and considering the evolving nature of the repository design, many unanswered questions remain. For example, the EPA exposure standards siting guidelines, and even more importantly how the DOE plans to address the issue that the Nuclear Waste Policy Act prohibits interim storage on the same site as a permanent repository.

5 The SDEIS does not evaluate human cumulative impacts, for example those as a result of the high-level waste added to the results from the ongoing effects of the prior nuclear testing activities and the transportation and storage of low-level waste at the Nevada Test Site.

6 In addition, we feel that national stakeholders cannot readily participate in the SDEIS public hearings, which is an opportunity that was afforded to them in the DEIS process.

7 I have some specific comments related to the design. Those will be incorporated in our written comments that we'll submit this evening. Just a few quick ones though. Errors and inconsistencies in the TSPA-SR and model validation casts some doubt on the conclusions, and those details will be in our written remarks.

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The site suitability decision must be made based on valid reliable scientific data. The public must have confidence in any decision made by the federal government, especially with such long-term effects. Deficiencies are so significant we feel in the S&ER and the SEIS that we feel these documents should be withdrawn and resubmitted pending resolution of all the assurance issues and other unanswered questions.  
Thank you.